

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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AKIRO LLC,

Plaintiff,

vs.

HOUSE OF CHEATHAM, INC.,

Defendant.

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Plaintiff, Akiro LLC, in accordance with the rules of this Court and the Local Rules of the United States District Court for the Southern District of New York, sets forth the following as its proposed Verdict Sheet.

**AS TO ALL CLAIMS OF FEDERAL  
TRADEMARK INFRINGEMENT AND UNFAIR COMPETITION**

1. Did Plaintiff prove that Defendant selected used Defendant's trademark AUNT JACKIE'S in a manner likely to cause confusion about the source of Defendant's hair care products?

YES \_\_\_\_\_

NO \_\_\_\_\_

**AS TO ALL CLAIMS OF COMMON LAW UNFAIR COMPETITION**

2. Did Plaintiff prove, by a preponderance of the evidence, that Defendant acted with bad faith when it infringed on Plaintiff's trademark?

YES \_\_\_\_\_

NO \_\_\_\_\_

**DAMAGES**

3. What amount of compensatory damages do you award to the Plaintiff?

\$ \_\_\_\_\_

4. Did Plaintiff prove that Defendant's conduct in infringing on Plaintiff's trademark constituted gross, wanton, or willful fraud or other morally culpable conduct to an extreme degree?

**YES** \_\_\_\_\_

**NO** \_\_\_\_\_

In what amount? \_\_\_\_\_

**INJUNCTIVE RELIEF**

5. Did Plaintiff prove that Defendant's conduct in infringing on Plaintiff's trademark establish grounds for Plaintiff to preclude and enjoin Defendant from forever using the trademark AUNT JACKIE'S in connection with hair care products?

**YES** \_\_\_\_\_

**NO** \_\_\_\_\_

**ATTORNEYS' FEES**

6. Did Plaintiff prove that Defendant's conduct in infringing on Plaintiff's trademark entitle Plaintiff's to recover attorneys' fees?

**YES** \_\_\_\_\_

**NO** \_\_\_\_\_

In what amount? \_\_\_\_\_